

*IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION AT KNOXVILLE*

IN RE:

INDUSTRIAL FABRICATION & REPAIR, INC., Case No. 3:18-bk-30530-SHB
Chapter 11

Debtor & Debtor in Possession.

**DEBTOR'S MOTION FOR ADDITIONAL TIME
TO FILE PLAN AND DISCLOSURE STATEMENT**

NOTICE OF HEARING

Notice is hereby given that:

A hearing will be held on the Motion for Additional Time to File Plan and Disclosure Statement on July 19 at 10:00am, in Courtroom 1C, United States Bankruptcy Court, Howard H. Baker Jr. Courthouse, 800 Market Street Knoxville TN 37902.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you wish to have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend this hearing, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

COME NOW the Debtors / Debtors in Possession, by counsel, and move the Court to extend the time during which they may exclusively file their plan and disclosure statement and to further extend the time by which a plan must be accepted as provided in 11 U.S.C. §1121 as follows:

1. The debtors filed their petition and the order for relief was entered on February 27, 2018. The debtors serve as debtors-in-possession. This is not a small business case.

2. The 120-exclusive period for filing a disclosure statement and plan will expire on June 27, 2018. One of the critical elements necessary for a disclosure statement and plan is to obtain debtor financing. Following their work, the debtors will then need additional time to formulate a final disclosure statement and plan. As a result, the debtors move for an additional 180 days during which they may exclusively file a disclosure statement and plan which date the debtors calculate to be December 24, 2018.

3. The debtors further move to extend the deadline by which they must have an accepted plan by a similar 180 days.

Respectfully submitted,

/s/ Ryan E. Jarrard

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CERTIFICATE OF SERVICE

I hereby certify that on this the **15th of June** **2018**, a copy of the foregoing **Motion, and Proposed Order** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. A copy was also sent via US Mail, first class prepaid to:

Tiffany DiIorio
800 Market Street, Suite 114
Howard J. Baker Jr. US Courthouse
Knoxville, TN 37902

All parties on the attached list

/s/ Ryan E. Jarrard
ATTORNEY